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08/09/2008 08:43 PM To
Jose Torres/R6/USEPA/US@EPA
cc

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Subject
Proposed Class 1 Injection Wells

History:
This message has been forwarded.

Mr. Torres,

Please take a stand with the residents of Conroe, The Woodlands, and Montgomery County, Texas, in opposition to the proposed TexCom Gulf Disposal , LLC Class 1 waste injection wells at Creighton Road and FM 3083.

In February 2007, I reviewed the TexCom application for permits and found many areas of non-compliance with state law. My request for a contested case hearing was recognized by TCEQ as justified. During the preliminary contested case hearing in July 2007, I was recognized by the court as an "affected person" and I participated in the complete hearing process. After listening in an objective manner to all the evidence, I, as an engineer, remain convinced that too many unknowns exists to justify disposal of wastes in the old Conroe Oil Field. It takes only one abandoned oil well in contact with the injected waste material to become a conduit for waste to contaminate our aquifers through corroded casing. Injection is proposed in the Cockfield Formation, which was the producing formation. Approving permits for TexCom is not worth the risk of contaminating our drinking water.

Even though Montgomery County, the City of Conroe, Lone Star Groundwater Conservation District, and the affected persons all stood in opposition to the TexCom disposal wells and presented sufficient evidence for any reasonable person to deny the permits, the administrative law judges took the side of TexCom. During the contested case hearing, it was obvious to all the opposition that TCEQ was pro TexCom and anti citizens. I am personally not opposed to deep well injection, but the location in the old Conroe Oil Field is a disaster waiting to happen. The permits should be denied.

A final public hearing by TCEQ is pending, but due to their pro-business posture, the final decision is predictable. Please, we need the EPA to intervene in whatever way possible to stop TexCom in Montgomery County.

I would appreciate being advised of your action in this matter.

Sincerely,

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